

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION, Plaintiff, v. RUSSELL C. MELVIN, Defendant.	Civil Action No.: 1:14-cv-00225-AKH DECLARATION OF NICHOLAS PAUL GRANATH
---	---

I, Nicholas Paul Granath, do declare as follows:

1. I am counsel of record for Plaintiff Delta Pilots Association (“DPA”) in the above-captioned matter, along with Lee Seham, Esq., Lucas Middlebrook, Esq., and George Diamantopoulos, Esq.
2. I make this Declaration of my own free will, based on my personal, first-hand knowledge, unless otherwise specifically indicated.
3. This Declaration is in support of “Plaintiff’s Memorandum Of Law Opposing Defendant’s Motion For Summary Judgment.”
4. In this matter to date, DPA has produced 594 pages of documents in discovery to Defendant; Defendant produced 420 pages of documents in discovery. However, prior to Defendant’s motion for summary judgment on June 25, 2018 (Doc. 89), no deposition were taken or noticed.
5. Attached and labeled as **Exhibit 1** is a true and correct copy of documents produced in discovery ‘bate stamped’: “DPA 1-78” (Sealed Motion - Docket No 44 with attachments).
6. Attached and labeled as **Exhibit 2** is a true and correct copy of documents produced in discovery ‘bate stamped’: “DPA 79-87” (Squarespace subpoena 1 of 3).
7. Attached and labeled as **Exhibit 3** is a true and correct copy of documents produced in discovery ‘bate stamped’: “DPA 88” (Squarespace - Letter re subpoena 1 of 3).

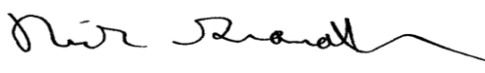
8. Attached and labeled as **Exhibit 4** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 89-168" (Squarespace - Letter re subpoena 1 of 3).
9. Attached and labeled as **Exhibit 5** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 169-178" (Verizon subpoena 1 of 1).
10. Attached and labeled as **Exhibit 6** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 179-182" (Verizon response to subpoena 1 of 1).
11. Attached and labeled as **Exhibit 7** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 183-192" (Subpoena to ATT 1 of 1).
12. Attached and labeled as **Exhibit 8** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 193" (ATT response to subpoena 1 of 1).
13. Attached and labeled as **Exhibit 9** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 194-203" (Squarespace subpoena 2 of 3).
14. Attached and labeled as **Exhibit 10** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 204-213" (Fiberhub subpoena 1 of 1).
15. Attached and labeled as **Exhibit 11** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 214-216" (Fiberhub response to subpoena 1 of 1).
16. Attached and labeled as **Exhibit 12** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 217-226" (TimeWarner subpoena 1 of 1).
17. Attached and labeled as **Exhibit 13** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 227-228" (TimeWarner response to subpoena 1 of 1).
18. Attached and labeled as **Exhibit 14** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 229-241" (ALPA Intl subpoena 1 of 1).
19. Attached and labeled as **Exhibit 15** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 242-259" (ALPA Intl response to subpoena 1 of q).

20. Attached and labeled as **Exhibit 16** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 260-261" (Contact Privacy Request 1 of 1).
21. Attached and labeled as **Exhibit 17** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 262-268" (Contact Privacy response to request 1 of 1).
22. Attached and labeled as **Exhibit 18** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 269-270" (Contact Privacy email).
23. Attached and labeled as **Exhibit 19** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 271-273" (Contact Privacy more email).
24. Attached and labeled as **Exhibit 20** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 274-286" (ALPA MEC subpoena 1 of 1).
25. Attached and labeled as **Exhibit 21** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 287-304" (ALPA MEC response to subpoena 1 of 1).
26. Attached and labeled as **Exhibit 22** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 305-322" (Squarespace subpoena 3 of 3).
27. Attached and labeled as **Exhibit 23** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 323-250" (Squarespace response to subpoena 3 of 3).
28. Attached and labeled as **Exhibit 24** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 351" (Squarespace email re subpoena 3 of 3).
29. Attached and labeled as **Exhibit 25** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 352-368" (Peer1 subpoena 1 of 1).
30. Attached and labeled as **Exhibit 26** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 369-379" (GoDaddy subpoena 1 of 1).
31. Attached and labeled as **Exhibit 27** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 380-484" (GoDaddy response to subpoena 1 of 1).

32. Attached and labeled as **Exhibit 28** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 485" (DPA witness fee).
33. Attached and labeled as **Exhibit 29** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 486-506" (Finance Log2012).
34. Attached and labeled as **Exhibit 30** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 507-531" (Finance Log2013).
35. Attached and labeled as **Exhibit 31** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 532-551" (part one of three of redacted attorney billing and costs) served upon Defendant on May 15, 2018 (SSMP fee and cost 1 of 3).
36. Attached and labeled as **Exhibit 32** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 552-571" (part two of three of redacted attorney billing and costs) served upon Defendant on May 15, 2018 (SSMP fee and cost 2 of 3).
37. Attached and labeled as **Exhibit 33** is a true and correct copy of documents produced in discovery 'bate stamped': "DPA 572-594" (part three of three of redacted attorney billing and costs) served upon Defendant on May 15, 2018 (SSMP fee and cost 3 of 3).
38. Attached and labeled as **Exhibit 34** is a true and correct copy of a cover letter your Declarant sent to Defendant's counsel on May 15, 2018, along with attachments.
39. Attached and labeled as **Exhibit 35** is a true and correct copy of "Delta Pilot's Association's Supplemental Attachment B and Rule 26(a)(1)(iii) Disclosure" dated May 15, 2018, that was then served upon Defendant.
40. Attached and labeled as **Exhibit 36** is a true and correct copy of the transcript of the motion hearing on August 14, 2014.

Pursuant to 29 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 15, 2018

By: 

Nicholas Paul Granath, Esq.